

REMARKS

Applicants respectfully request reconsideration of the present application in view of the reasons that follow.

A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, is presented, with an appropriate defined status identifier.

Claims 42-56 remain pending in this application.

Claim Rejections under 35 U.S.C. § 103

Claims 42-56 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,745,574 (“Muftic”) in view of U.S. Patent Publication No. 2002/0031230 (“Sweet et al.”), in further view of Alfred J. Menezes et al., *Handbook of Applied Cryptography*, CRC Press, 1997 (“Menezes et al.”) and further in view of U.S. Patent No. 5,740,361 (“Brown”). In response, Applicants respectfully traverse the rejection for the reasons set forth below.

Applicants rely on M.P.E.P. § 2143, which states that to establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation in the prior art to modify the reference. Second, there must be a reasonable expectation of success. Third, the prior art must teach or suggest all the claim limitations. Applicants submit that none of the references, alone or in combination, disclose each and every element of independent claim 42.

In the embodiment of claim 42, the method of communicating credentials comprises communicating a composite credential to a second party. The composite credential comprises a plurality of obfuscated credentials. Different obfuscation is used for at least two credentials in the composite credential. The second party de-obfuscates at least one credential. In addition, the second party communicates to a third party at least one obfuscated credential from the composite credential wherein the third party obtains a credential of the first party from the obfuscated credential without directly communicating with the first party.

In contrast, the combination of Muftic, Sweet, Menezes et al. and Brown do not disclose, teach or suggest each and every limitation of independent claim 42 as amended. Muftic is directed to a security infrastructure for electronic transactions. Sweet is directed toward security management using a web-based application service model. Menezes et al. is a text book on general cryptography. Finally, Brown is directed to a remote passphrase authentication service for authenticating a user over an insecure network. The Office Action acknowledges that Muftic, Sweet and Menezes et al. in combination do not disclose, teach or suggest a method of communicating credentials having “the second party communicating to a third party at least one obfuscated credential from the composite credential, wherein the third party obtains a credential of the first party from the obfuscated credential without directly communicating with the first party.”

The Office Action now cites a fourth reference to allegedly cure the deficiencies of the previous three references. The Office Action states that Brown “teaches the communication between first party and third party is indirectly [sic] and may not be necessary at all.” Applicants disagree and believe that Brown can not be properly used as a reference. First, Brown does not disclose indirect communication between a first part and third party. *See* Col. 5, lines 48-50, “The service and user exchange random challenges. The user calculates a response and sends it to the service. The service calculates a response.” Brown also discloses the use of an intermediate party for authentication described as an “authentication deity.” *See* Fig. 1; Col. 4, lines 52-55 *stating*, “An authentication “deity” knows the users’ and services’ pass-phrases. The service communicates with the authentication deity during the authentication process.” The authentication process in Brown is summarized in Col. 5, line 42- Col. 6, line 5. The passage clearly shows that during the authentication process the user and service are in direct communication with each other as well as the authentication deity.

Further, Brown discusses the use of authentication, reauthentication and reauthentication cheating. Brown states, “Three parties or entities participate in the authentication process: the user; the service; and the authentication deity.” *See* Col. 5, lines 15-21. In addition, Brown explains that reauthentication can only take place after authentication has been performed. *See* Col. 5, lines 5-7, *stating* “Reauthentication is a process by which a user and service, having recently authenticated one another, may again

authenticate one another.” Accordingly, a close reading of the disclosure of Brown reveals that in order for reauthentication to occur the authentication process taught in Brown must first take place. “The identical invention must be shown in as complete detail as is contained in the claim.” *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989). Thus, Applicant respectfully submits that Brown does not disclose, teach or suggest a method of communicating credentials having “the second party communicating to a third party at least one obfuscated credential from the composite credential, wherein the third party obtains a credential of the first party from the obfuscated credential without directly communicating with the first party.”

Moreover, in light of the numerous references the Examiner has combined to reject claims, the Applicant traverses the combinations made by the examiner and the imaginative modifications to the base reference made by the examiner as having no basis or motivation in the cited references. In the present claims, discovery of the problem is part of the invention. Specifically, the context and problems faced by the inventors relating to using composite credentials to communicate across a distributed network was not recognized in the art. It is settled that the person of ordinary skill in the art “thinks along the lines of conventional wisdom in the art and is not one who undertakes to innovate” - *Standard Oil Co. v American Cyanamid Co.*, 227 USPQ2d 293, 298 (Fed. Cir. 1985). It is further submitted that, in order to establish a *prima facie* case of obviousness, it is necessary to show that the hypothetical person of ordinary skill would, without any knowledge of the claimed subject matter and without any inventive activity, be motivated to arrive at the claimed subject matter given the guidance of the cited references when each is fully considered as statutorily required. This has not been shown by the four reference rejection with the multiple alterations to the references and the multiple examiner notices.

Accordingly, Applicants respectfully submit that the combination of Muftic, Sweet, Menezes and Brown fails to teach each and every element of claim 42 and request that the rejection be withdrawn. In addition, claims 43-56 depend from independent claim 42 as amended and should be allowed for at least the reasons set forth above. Accordingly, Applicant respectfully requests that the rejection be withdrawn and claims 43-56 be allowed.

Conclusion

Applicant believes that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

At any time during the pendency of this application, please charge any fees required or credit any over payment to Deposit Account 08-2025 pursuant to 37 C.F.R. § 1.25. Additionally, charge any fees to Deposit Account 08-2025 under 37 C.F.R. § 1.16 through § 1.21 inclusive, and any other sections in Title 37 of the Code of Federal Regulations that may regulate fees.

Respectfully submitted,

Date April 25, 2007

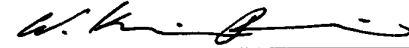

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